

FILED

MAR 02 2016

CLERK US DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA
BY *CC* DEPUTY

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In Pro Se

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA**

RICHARD CARUSO,

Plaintiff,

vs.

NATIONAL RECOVERY AGENCY, a
business entity form unknown,
TRANS UNION LLC, a business entity,
a National Credit Reporting Agency("CRA")
EXPERIAN INFORMATION SOLUTIONS
INC., a business entity, a National Credit
Reporting Agency ("CRA")
DOES 1 THROUGH 10, inclusively,

Defendants,

CASE NO: '16 CV 0534 WQH JMA

**CONSUMER NOTICE OF
DISPUTE OF DEBT**

CONSUMER NOTICE OF DISPUTE OF DEBT

COMES NOW, RICHARD CARUSO, pursuant to 15 U.S.C. §1692g,
Fair Debt Collection Practices Act (FDCPA) hereby disputes the alleged
consumer debts in their entirety, and any and all past or present debt's the Defendant's
claims that I the Plaintiff RICHARD CARUSO owes in the above-entitled matter.

THEREFORE, this NOTICE shall be deemed a request/demand for
"verification" and debt validation request as defined by 15 U.S.C.
§1692(g)(1)(2)(5)(b), and California Consumer Protection Statutes/Laws.

Plaintiff RICHARD CARUSO, hereby requests validation pursuant to
15 U.S.C. §1692 *et seq.*

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1 SPECIFICALLY, I dispute as to the identity of the true owner(s) (if any) of this
2 same alleged consumer debts, the alleged due an owing, I dispute all signatures on the
3 Defendant's unauthenticated hearsay documents, and the Defendant's alleged authority and
4 capacity to collect and/or sue on behalf of the same. The Defendant's in the above-entitled
5 case are "debt collectors" as that term is defined by 15 U.S.C. 1692a(3).

6 NATIONAL RECOVERY AGENCY is attempting to collect a "household debt" as
7 that term is defined by 15 U.S.C. §1692a(5).

8 LASTLY, I, Plaintiff RICHARD CARUSO upon viewing my consumer credit
9 reports whereby it was revealed that the Defendant's are reporting numerous alleged
10 negative debts over numerous past years on my personal consumer credit reports with two
11 of the three major credit reporting agencies.

12 I, RICHARD CARUSO, hereby request the Defendant NATIONAL RECOVERY
13 AGENCY to delete the inaccurate information immediately from my personal consumer
14 credit reports pursuant to 15 U.S.C. §1681 *et al.*
15 Parties must comply with the requests herein in a timely manner and completely.
16 Failure to provide the above-requested documentation will result in the Plaintiff
17 RICHARD CARUSO filing a claim for all damages and all court costs including attorney's
18 fees and costs accordingly.

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20 Dated this 2nd day of March 2016.

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22 Richard Caruso
23 RICHARD CARUSO, PLAINTIFF IN PRO SE
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